

REMARKS

1. Introduction

In the Office Action mailed January 8, 2008, the Examiner rejected claims 1, 3, 4, and 6-9 under 35 U.S.C. § 103(a) as being unpatentable over Karaoguz et al., U.S. Pub. No. 2002/0059434 ("Karaoguz") in view of Lu et al., U.S. Patent No. 6,694,134 ("Lu").

The Examiner rejected claims 10 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Karaoguz in view of Lu and further in view of Thornton et al., U.S. Pub. No. 2002/0101860 ("Thornton").

For the reasons set forth below, Applicants request reconsideration and allowance of the application.

2. Response to the Claim Rejections

Of the currently pending claims, claim 1 is independent. The Examiner has rejected claim 1 under § 103(a) as being unpatentable over Karaoguz in view of Lu. In response, Applicants submit that this rejection is improper and should be withdrawn because Karaoguz in view of Lu does not teach each and every element of claim 1, as set forth below.

Claim 1 recites, *inter alia*, "a private branch exchange (PBX) communicatively coupled to said at least one wireless access point" and "a second data register co-located with said PBX and communicatively coupled to said first data register, wherein said second data register stores a second data record for said multi-mode mobile station when said multi-mode mobile station operates in said second wireless coverage area, said second data register being able to transmit at least one mobility management message to said first data register, whereby said at least one

mobility management message facilitates roaming between said first and second wireless coverage areas by said multi-mode mobile station.” In rejecting claim 1, the Examiner admitted that Karaoguz does not teach these elements. *See* Office Action, p. 3. Instead, the Examiner relied on Lu, specifically citing to: (i) Figure 1; (ii) col. 6, lines 11-34; and (iii) col. 6, line 53 – col. 7, line 19. *See* Office Action, pp. 3-4. Lu, however, does not make up for the acknowledged deficiencies in Karaoguz.

As an initial matter, the Office Action does not state explicitly what in Lu supposedly corresponds to the claimed PBX and the claimed second data register. However, based on the sections of Lu cited by the Examiner, it appears that PBX 118 in Lu corresponds to the claimed in PBX in the Examiner’s rationale. In addition, Lu discloses that, in one embodiment, private cellular network 110 can include a WAVEXchange™ (WXC), which generally includes a built-in Visitor Location Registry (VLR)/Home Location Registry (HLR). *See* col. 6, lines 18-24. Thus, it appears that, in the Examiner’s rationale, a VLR/HLR in private cellular network 110 corresponds to the claimed second data register.

However, the mere identification of a PBX and a second data register in Lu is not enough to make up for the acknowledged deficiencies in Karaoguz, for at least two reasons. First, claim 1 recites that the second data register is *co-located* with the PBX. In contrast, the VLR/HLR in Lu is not co-located with the PBX because Lu teaches that private cellular network 110 and PBX 118 are *separate* elements. *See* Figure 1 and col. 7, line 63 – col. 8, line 4.

Second, claim 1 recites “said second data register being able to transmit at least one mobility management message to said first data register, whereby said at least one mobility management message facilitates roaming between said first and second wireless coverage areas

by said multi-mode mobile station.” In contrast, Lu does not disclose any mobility management message being transmitted by the VLR/HLR in private cellular network 110, much less a mobility management message to a “first data register.” If the Examiner believes otherwise, the Examiner is respectfully requested to point out what specific disclosure in Lu the Examiner contends corresponds to the “mobility management message” recited in claim 1.

Accordingly, Applicants submit that claim 1 is allowable over Karaoguz in view of Lu for at least the foregoing reasons. Applicants further submit that claims 3, 4, and 6-11 are allowable for at least the reason that they depend from an allowable claim.

3. **Conclusion**

Applicants submit that the present application is in condition for allowance, and notice to that effect is hereby requested. Should the Examiner feel that further dialog would advance the subject application to issuance, the Examiner is invited to telephone the undersigned at any time at (312) 913-0001.

Respectfully submitted,

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